



## Work Plan

### A. Project Title and Project Purpose Statement

The Choctaw Nation of Oklahoma is applying for Fiscal Year 2015 Environmental Justice Small Grants Program Funding from the Environmental Protection Agency, Office of Environmental Justice for the implementation of an education project focusing on the importance of keeping our water sources clean. The hands-on program will provide educational activities and recycling support to school children, elders groups, and civic groups in the areas surrounding Wister, McAlester, Sardis, Beaver's Bend, and Hugo Lakes in southeastern Oklahoma. The goal is to help citizens recognize the critical role of each individual in reducing the negative impact of litter in the local environment, protecting and conserving local waters, and making a positive impact on climate change.

This project, titled "Project Oka" (Oka is the Choctaw word for water) will be headquartered in the Choctaw Nation of Oklahoma Environmental Sustainability Office in Durant, Oklahoma (zip code 74702), but will extend to other areas in southeast Oklahoma including Wister, McAlester, Tuskahoma, Broken Bow, and Hugo. The project will support community climate resiliency by addressing local environmental issues and reducing vulnerability through education of citizens. Participants will be empowered to recycle litter instead of dumping to mitigate climate change and maintain the health of local water systems. The Choctaw Nation will draw from the Oklahoma Conservation Commission's Blue Thumb Program to provide education in line with:

*Choctaw Nation Office of Environmental Sustainability:  
Sustaining our people, our traditions, our earth.*

- The Clean Water Act, Section 104(b) (3) by providing training relating to the causes, effects, extent, prevention, reduction, and elimination of water pollution
- The Safe Drinking Water Act, Section 1442I (3) by providing education relating to the public health aspects of providing safe drinking water
- The Solid Waste Disposal Act, Section 8001(a) by providing a public education program relating to solid waste

### B. Environmental, Public Health and Community Climate Resiliency Information about the Affected Community

The Choctaw Nation of Oklahoma, the first *Promise Zone tribal designee*, is a non-reservation-based Native American Tribe recognized by the United States federal government through the Secretary of the Interior. The extremely rural territory of the Choctaw Nation encompasses 10,613 square miles in southeastern Oklahoma ~ *the second largest tribal area in*



*the lower 48 states.*<sup>1</sup> According to the Choctaw Nation of Oklahoma Tribal Membership Office, there are currently 171,979 enrolled Choctaw Tribal Members, 41,776 of whom live in the 10 ½ county Tribal Service Area in southeastern Oklahoma (see Figure 1).



Figure 1: Location of the Choctaw Nation of Oklahoma

The Choctaw Nation is home to a total of 52,351 Native Americans who, along with the rest of the population, suffer generational poverty, lack of resources, lack of educational attainment, and other social and economic challenges.<sup>2</sup> Area lakes provide tremendous economic impact to surrounding communities through the influx of dollars from recreation and tourism – an important industry in these underprivileged, rural communities and the third largest industry in Oklahoma.<sup>3</sup> The people of southeast Oklahoma are closely tied to the land they live on, though they do not always understand the impact of their activities on the land and water from which they draw their livelihood. Dumping trash, tires, electronics, old appliances, unwanted household items, etc., as well as general littering, around lakes and feeder waterways is a common occurrence. The Choctaw Nation, with funding assistance from the EPA Region 6 General Assistance Program (GAP), began mapping open dump sites in the Choctaw Nation for individual restricted property. Choctaw Nation currently has 94 open solid waste dumps mapped, not including tribal members on non-trust property, road side, or tribal trust land dumps. Funding has not been available to conduct assessments on these additional sites. If funding were available for assessments, it is estimated that numerous open dumps would be found due to the lack of waste management facilities, associated fees, distance issues, and the economic makeup of the jurisdictional area.<sup>4</sup>

The limited amount of permitted solid waste facilities available in the Choctaw Nation jurisdictional boundaries contributes to the large number of open dump sites. Five rural counties – Atoka, Choctaw, Coal, Hughes, and Latimer – have no access to a solid waste facility or transfer station. Even with access to landfills and transfer stations in the six remaining counties, open dumps and illegal dumping remain an unresolved issue.

Open dumps and illegal dumping quickly become an environmental, public health, and climate resiliency issue through the obvious negative effects of electronics, tires, and garbage in the environment (i.e. surface and groundwater pollution) and the not-so-obvious, though

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<sup>1</sup> U.S. Census Bureau. 2000 Census of Population and Housing, Summary Population and Housing Characteristics, PHC-1-38, Oklahoma. Washington, D.C. 2002.

<sup>2</sup> U.S. Census Bureau. 2008-2012 American Community Survey 5-Year Estimates. Table B02101: American Indian and Alaska Native Alone or in Combination with One or More Other Races.

<sup>3</sup> Oklahoma Tourism and Recreation Department. Tourism's Impact on Oklahoma's Economy. 2010 National Tourism Week White Paper. May 5, 2010.

<sup>4</sup> Choctaw Nation of Oklahoma, Environmental Office. Tribal Solid Waste Management Plan. 2013.



significant, effects of greenhouse gas production, which could be reduced by recycling.<sup>5</sup> The climate change resulting from greenhouse gas production has a disproportionate economic effect on the areas surrounding Choctaw Nation lakes. The effects changing weather patterns have on lake levels directly impacts the money brought in by recreation and tourism. This effect has been vividly apparent in recent years as drought conditions in southeast Oklahoma have dramatically dropped lake levels – some area lakes have been more than 10 feet below normal levels, according to the Oklahoma Water Resources Board.

The Choctaw Nation has achieved positive results from previous efforts to educate the public about and provide support for recycling. In 2014, the Going Green Team of the Choctaw Nation garnered the Tribal Government Programs environmental excellence award from the Oklahoma environmental organization Keep Oklahoma Beautiful. The award recognized the success of a recycling drive at the Nation's annual Labor Day Festival, which featured presentations on waste stream assessment and water conservation and set up displays showing how recycling can be done. The net result was 3,565 pounds of cardboard, 2,758 pounds of plastic, 1,126 pounds of aluminum, 45 pounds of tin and 86 pounds of paper collected during the drive.

These results show the willingness of the people of the Choctaw Nation to embrace environmental stewardship when they have adequate education and opportunities to do so. In a world full of concern and confusion about climate change, providing individuals the opportunity to engage in an activity that is proven to reduce climate change is emboldening. This program will address the issue of dumping and littering through education and hands-on activities to empower citizens to recognize their critical role in reducing the negative impact of litter in the local environment, protecting and conserving local waters, and making a positive impact on climate change. Additionally, the program will help build the capacity of communities to create self-sustaining, community-based partnerships with the Choctaw Nation that will continue to improve local environments in the future. The Choctaw Nation will invite the communities around area lakes to work with them as they complete a disaster recovery plan addressing concerns including debris management, items which can be recycled, climate change preparedness, and adaptation strategies.

### **C. Organization's Historical Connection to the Affected Community**

In 1830 during what became known as the Trail of Tears, the Choctaw people were forcibly removed from Mississippi to the southeastern part of Indian Territory to what would become the Choctaw Nation of Oklahoma. Today, there are over 40,000 tribal members living in the 10 ½ county tribal service area, and the Nation is a driving force for progress in the rural area. There are Choctaw Nation Community Centers in each county and numerous events are held every month to maintain ongoing communications between tribal leaders and community residents. Tribal activities are directed by the 12 elected members of the Tribal Council and the

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<sup>5</sup> U.S. Environmental Protection Agency Region 4. Source Reduction and Recycling: A Role in Preventing Global Climate Change. Accessible online at:  
[http://www.epa.gov/region4/rcra/mgttoolkit/documents/Climate\\_Change\\_Fact\\_Sheet.pdf](http://www.epa.gov/region4/rcra/mgttoolkit/documents/Climate_Change_Fact_Sheet.pdf).



elected Chief. Through these channels of communication, tribal members actively participate in the decision-making process, and have indicated desire for programs to address environmental concerns. The governmental organization of the Choctaw Nation is uniquely capable of addressing local environmental, public health, and community climate resiliency issues in southeast Oklahoma because it is the only organization large enough to maintain staff dedicated to these issues and pursuing grants, such as this one, that will increase the community's capacity to address the issues. Because the Choctaw Nation of Oklahoma is the affected community, an ongoing relationship between the organization and community residents is maintained and sustained.

In 2008, Choctaw leaders called for the creation of a Going Green Team. The team began education efforts and recycling activities on a small scale at that time. Then in September 2009, the Nation added a recycling center to the vast array of services available to Choctaw tribal members and the community as part of the Nation's commitment to being a responsible steward of the environment in order to minimize the population's impact on the environment for future generations.

#### **D. Project Description**

In order to address the concerns outlined in *Section B, Environmental, Public Health and Community Climate Resiliency Information about the Affected Community*, the Choctaw Nation of Oklahoma will implement a hands-on program to provide educational activities focusing on the importance of keeping our water sources clean as well as recycling support in partnership with public schools, elders groups, and civic groups in the areas surrounding Wister, McAlester, Sardis, Beaver's Bend, and Hugo Lakes. The goal is to help citizens recognize the critical role of each individual in reducing the negative impact of litter in the local environment, protecting and conserving local waters, and making a positive impact on climate change.

This project, titled "Project Oka" (Oka is the Choctaw word for water) will be headquartered in the Choctaw Nation of Oklahoma Environmental Sustainability office in Durant, Oklahoma, but may extend to other areas in southeast Oklahoma near major bodies of water including Wister, McAlester, Tuskahoma, Broken Bow, and Hugo. The project will support community climate resiliency by addressing local environmental issues and reducing vulnerability through education of citizens. Participants will be empowered to reduce dumping and recycle litter to mitigate climate change and maintain the health of local water systems.

Project Oka will deliver this education at local schools and community centers and by involving participants in hands-on cleanup projects around area lakes. While many schools may choose to only participate in the in-school portion of the programming, the events at the lakes will have an added benefit. Results of educational programming delivered at the lakes will be two-fold: 1) education for individuals, and 2) cleaner lakes. Giving individuals, especially students, the opportunity to "get their hands dirty" involves them in natural resources management in a way that will be meaningful to them as there will be tangible proof of what they have accomplished and they will be able to bring friends and family to the area that they helped manage.



With either the in-school or at-the-lake delivery method, participants will be educated on the critical role of each individual in reducing the negative impact of litter in the local environment, protecting and conserving local waters, and making a positive impact on climate change. Participants will be encouraged to participate in hands-on learning activities such as a pollution simulator, which uses dye on a contoured landscape model to show the contaminating effects of pollutants in a watershed. Activities will be designed to show the downstream effects of pollutants, pointing out that what lies downstream may very well be the lake where the community gets its drinking water. The program will also talk about the importance of recycling materials instead of dumping them, especially tires and electronics, and the effect these materials have on the health of local waters. The educational programming will be developed by the Project Manager, Ms. Tracy Horst, and Mr. Jon Hotubbee whose qualifications are discussed in *Section F, Qualifications of the Project Manager*. Both Ms. Horst and Mr. Hotubbee, who will provide the educational programming, will receive “train the trainer” training from the Oklahoma Conservation Commission’s Blue Thumb Program, which provides a wealth of hands-on activities and resources to be used to educate people of all ages about the importance of taking care of our environment. The programming will draw on resources from the Oklahoma Department of Environmental Quality and the Blue Thumb Program and will be in line with:

- The Clean Water Act, Section 104(b) (3) by providing training relating to the causes, effects, extent, prevention, reduction, and elimination of water pollution
- The Safe Drinking Water Act, Section 1442I (3) by providing education relating to the public health aspects of providing safe drinking water
- The Solid Waste Disposal Act, Section 8001(a) by providing a public education program relating to solid waste

Many local schools have expressed their excitement about Project Oka. In order to reach the maximum number of students, Project Oka staff will present the educational program at participating schools or invite schools to transport students to the Project Oka programming at the lake nearest them – Wister, McAlester, Sardis, Beaver’s Bend, or Hugo – where students can take part in cleaning up around the waterway. Students will learn about litter prevention, recycling, and how each person can do their part to keep our lakes healthy. The method of delivery will be tailored to each school’s needs. If possible, schools will be encouraged to host Project Oka in their school for educational activities, then bring high school students to their area waterway for a “Community Event” at a later date. Students who participate in the Community Event at the lakes will help clean around lakes, giving them a sense of accomplishment and ownership in their lake. In addition, recycling containers will be placed in schools to give students a way to use their knowledge of recycling. Schools have expressed their difficulty in finding places to recycle electronics, and Project Oka, in conjunction with the existing Choctaw Nation Recycling Centers, will provide this to partner schools. Teachers will be surveyed after the completion of Project Oka activities with their class to determine if there was an increase in knowledge of and enthusiasm for recycling and protecting local waterways for their students. Schools will participate in Project Oka throughout the 2015-2016 school year.

In 2012, the Choctaw Nation of Oklahoma began a program to provide summer school education to students in Pre-Kindergarten through second grades throughout the Choctaw Nation. Partnership Of Summer School Education (POSSE) provides students with innovative





curricula in reading and math and extracurricular activities to expand their horizons. Past extracurricular activities have included trips to the Choctaw Nation Durant Recycling Center operated by the Office of Environmental Sustainability where students participate in many activities focused on recycling. Project Oka will expand on this partnership between POSSE and the Office of Environmental Sustainability by adding additional educational activities about not littering and keeping lakes healthy. POSSE students will participate in Project Oka in the summer of 2016.

Elders' groups meet at Choctaw Nation Community Centers throughout the 10 ½ counties. These groups often participate in community projects and are eager to participate in Project Oka to learn about reducing the negative impact of litter in the local environment, protecting and conserving local waters, and increasing the positive impacts of recycling on climate change, as well as helping to clean up areas around community lakes. Many community civic groups throughout the 10 ½ counties have expressed the same eagerness. These groups will be invited to participate in "Community Events" at their area lakes where they can work side-by-side with students to clean up the area, help prepare lunch for students, share memories of the lakes, and provide an intergenerational facet to the Event. Additionally, these groups will be necessary collaborative partners in the development of a disaster recovery plan addressing concerns including debris removal, items which can be recycled, climate change preparedness, and adaptation strategies.

Two of the major categories of items found in illegal dumps are electronics and tires. Landfills no longer accept electronic equipment, so many schools, other organizations, and individuals are left with no way to dispose of unwanted items. Used tires are also problematic as very few facilities accept them. The Choctaw Nation Going Green Team has had tremendous support for their recycling efforts with these categories, and sees the need for many more recycling opportunities for electronics and tires. Therefore, these types of items will be collected at participating schools, community centers, and civic groups.

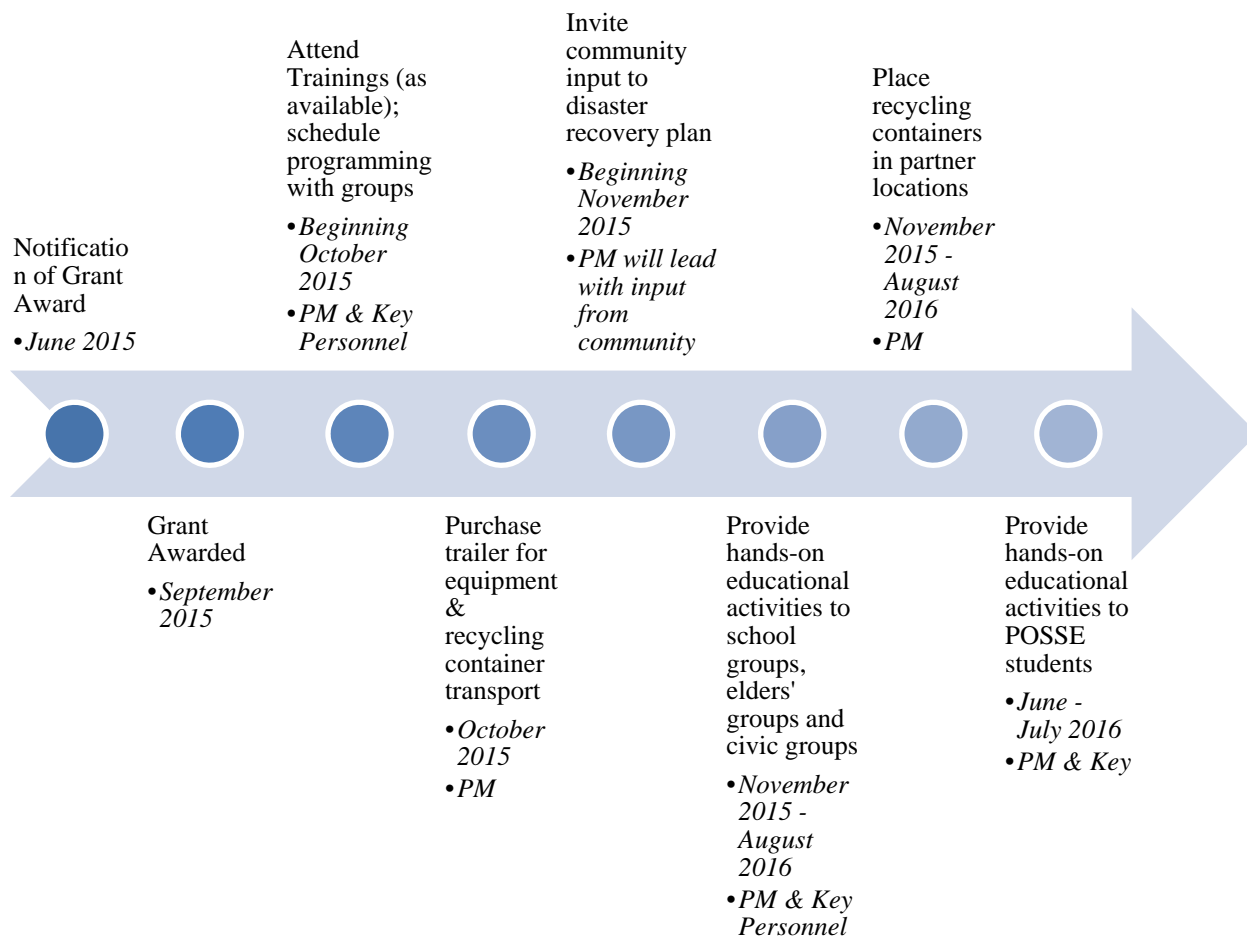
The Choctaw Nation of Oklahoma is excited about the opportunity to engage the community in this educational project and will provide the salaries and benefits for all staff involved and vehicles for transporting staff and equipment. A trailer will be necessary to transport recycling containers and equipment for programming at area schools and lakes; the cost for a trailer is included in the budget.

The Choctaw Nation will invite communities around area lakes to provide insight and advice in creating a disaster recovery plan for the Choctaw Nation addressing concerns including debris removal, items which can be recycled, climate change preparedness, and adaptation strategies. Debris removal is often an important first step in dealing with the aftereffects of a tornado, flood, or other disaster, and community input will be critical in the development of this section of the plan. The collaborative partnerships established with public school, elder group, and civic group stakeholders who share the Choctaw Nation's desire to address the local environmental issues affecting the communities will be a necessary component in the collaborative problem-solving required for an effective disaster recovery plan. Jeff Hansen, Emergency Manager for the Choctaw Nation, has begun writing a plan and supports Project Oka in gaining community buy-in and participation. Hopefully, after participating in the Choctaw



Nation disaster recovery plan, individual communities will be inspired to create their own plans. The net result of Project Oka will be communities around Choctaw Nation lakes and waterways with increased capacity to address local environmental, public health and community climate resiliency issues by recognizing the critical role of each individual in reducing the negative impact of litter in the local environment, protecting and conserving local waters, and making a positive impact on climate change.

### Timeline



### E. Organizational Capacity and Programmatic Capability

The Choctaw Nation of Oklahoma has the organizational capacity and programmatic capability to undertake this project with a Finance Department experienced in managing assistance agreement funds efficiently and effectively. Currently, the Choctaw Nation employees over 5,500 individuals, with hundreds of them funded by federal assistance agreements. The Finance Department has tremendous experience expending grant funds in a timely and efficient manner, and maintains accounting records to identify the funds received and expended under each grant and to document and support each expenditure. Additionally, the Finance Department maintains internal controls to safeguard funds and assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage



adherence to prescribed management policies. The Nation maintains an Internal Auditing Department and conducts an external third-party audit by an independent certified public accountant annually, the results of which are available upon request.

The Choctaw Nation has demonstrated past performance in successfully completing and managing assistance agreements similar in size, scope, and relevance to the proposed project and a history of meeting reporting requirements under these agreements as described in *Section G, Past Performance in Reporting on Outputs and Outcomes*. The Choctaw Nation has been a recipient of EPA grant agreements in the last five years, and past performance in meeting reporting requirements, the name of the Project Officer overseeing the grant agreements, and the assistance agreement numbers associated with the projects are listed in *Section G*. Staff for this project have recent, relevant experience that will allow them to effectively manage and successfully complete this proposed project as described in *Section D, Project Description* and *Section F, Qualifications of the Project Manager*.

With experience operating two Recycling Centers, the Choctaw Nation has the organizational experience to successfully achieve the objectives and complete the project activities described in this work plan in a timely manner. The knowledgeable staff are highly qualified and have the necessary resources as described in *Section F, Qualifications of the Project Manager*.

#### **F. Qualifications of the Project Manager**

The Project Manager will be Ms. Tracy Horst, the Director of the Office of Environmental Sustainability for the Choctaw Nation of Oklahoma. Prior to her employment with the Choctaw Nation, Ms. Horst graduated from Southwestern College in Winfield, Kansas with a Bachelor of Science Degree in Biology and a Bachelor of Arts Degree in Chemistry and worked in the private sector with quality assurance experience. Ms. Horst became employed with the Choctaw Nation Project Management Office in 2007 where her job duties included working within the Choctaw Nation Health Care System to implement procedures and system improvements; responsibility for researching business opportunities and reviewing portfolios; establishing and implementing new projects; and serving as Chairman of the Going Green Initiative, which consisted of organizing and implementing Going Green programs for employees, members and communities. As the Choctaw Nation's Going Green Initiative gained momentum, Ms. Horst was appointed Director of a new department within the Nation – the Office of Environmental Sustainability. This office has grown to include recycling centers at Durant and Poteau as well as numerous education programs for tribal employees and members. Ms. Horst has also served as Project Manager for grants such as the EPA Climate Showcase Communities grant and the Administration for Native Americans Social and Economic Development Strategies (SEDS) grant.

Ms. Horst leads the Office of Environmental Sustainability in partnerships with the Poteau Valley Improvement Authority and Durant Community Clean-up to help remove and recycle litter in these communities. Her office also provides education for senior citizens at Choctaw Nation Community Centers and for students in public schools throughout southeast Oklahoma. The office received an environmental education grant from the Oklahoma Department of Environmental Quality to place recycling containers and provide educational





programming in local schools; the Choctaw Nation has worked with six schools through this project. They continue to work with the education sector and are scheduling with at least three additional schools and four vocational technology campuses to educate on recycling and potentially set up programs. Ms. Horst's ties with and connection to the Choctaw Nation, her educational and work experience qualifications, and her current and past activities with the Choctaw Nation make her uniquely qualified to lead this project.

Another key staff member for this project will be Jon Hotubbee. Mr. Hotubbee's career encompasses more than twenty years of professional experience in positions of responsibility in the areas of public relations, counseling, supervision/management, and coordination/scheduling. He is currently the Coordinator for the Choctaw Nation Recycling Center in Poteau, Oklahoma, where, in addition to his duties as Coordinator, he provides interactive trainings and presentations in local schools and the community and has developed partnerships with school and community leaders to raise awareness of the importance of recycling. Mr. Hotubbee will be providing much of the educational programming for this project.

Please see the attached resumes for Ms. Horst and Mr. Hotubbee.

#### **G. Past Performance in Reporting on Outputs and Outcomes**

The Choctaw Nation of Oklahoma has not received an Environmental Justice Small Grants award during fiscal years 2009 through 2013. However, the Nation has received Environmental Protection Agency (EPA) grants for both short-term projects and programs. The Choctaw Nation was awarded the EPA General Assistance Program (GAP) grant for the last consecutive 15 years for capacity building, baseline assessment and small projects. The EPA Clean Air Act (CAA) Section 103, the EPA Clean Water Act (CWA) Section 106, the EPA Climate Showcase Community grant, and the Administration for Native Americans Social and Economic Development Strategies (SEDS) grant have also been awarded to the Choctaw Nation. These grants have successfully documented and reported on progress towards achieving the expected outputs and outcomes of these agreements as described below.

The Choctaw Nation Environmental Office was awarded the GAP grant, GA-96693001-3 for the timeframe of 10/01/2009-09/30/2012 for the funded amount of \$401,588. Objectives include: Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP) development and maintenance for Geographic Information System (GIS) implementation; participation in recycling; Final Application activities; capacity building; solid waste cleanup activities; and GIS baseline data development. QMP and QAPP documents were submitted and approved by EPA Region 6. All expected outputs and outcomes were successfully completed within the allocated timeframe. Reporting history includes timely and adequate quarter and annual financial and progress reporting as required in the Assistance Agreement. Melissa Robinson, Environmental Director for the Choctaw Nation of Oklahoma was the Project Manager for the funded program.

The Choctaw Nation Environmental Office was awarded the CAA Section 103, XA-96681501-4, for the timeframe of 10/01/2008-12/31/2011 for the funded amount of \$276,198. Project funds assisted with obtaining the resources necessary to begin a three phase process to conduct ozone monitoring within tribal boundaries. Objectives include: Development and



maintenance of a QAPP for ozone data collection; capacity building; data collection; facility development; data reporting; quality assurance maintenance of collection equipment; equipment certification; quarter and annual audits; and comparing data to the National Ambient Quality Standards (NAAQS). All expected outputs and outcomes were successfully completed within the allocated timeframe. Reporting history includes timely and adequate quarter and annual financial and progress reporting as required in the Assistance Agreement, and ozone data collection reporting into Air Quality Systems (AQS). Melissa Robinson, Environmental Director for the Choctaw Nation of Oklahoma was the Project Manager for the funded program.

The Choctaw Nation Environmental Office was awarded the CWA Section 106, 1-OOF17801-0, for the timeframe of 10/01/2010-09/30/2012 for the funded amount of \$130,000 with a 5% tribal match of in-kind services. Objectives include: capacity building; QAPP development and maintenance for water monitoring data collection activities; and monitoring equipment acquisition. All expected outputs and outcomes were successfully completed within the allocated timeframe. Reporting history includes timely and adequate quarter and annual financial and progress reporting as required in the Assistance Agreement. In addition, a Tribal Assessment Report (TAR) and Annual Progress Report were submitted at the end of the annual grant period to the EPA Region 6 Project Officer. Melissa Robinson, Environmental Director for the Choctaw Nation of Oklahoma was the Project Manager for the funded program.

The Choctaw Nation Project Management Office was awarded the EPA Climate Showcase Community Choctaw Project HELP, AF-83495401, for the timeframe of 02/01/2011-01/31/2013 for the funded amount of \$189,817. This project reduced greenhouse gas emissions by developing and implementing a greenhouse gas reduction program targeting lighting in five tribal health facilities and created a model for a wide variety of rural and tribal communities to implement. All expected outputs and outcomes were successfully completed within the allocated timeframe. Reporting history includes timely and adequate quarter and annual financial and progress reporting as required in the Assistance Agreement. Tracy Horst, the Office of Environmental Sustainability Director for the Choctaw Nation of Oklahoma was the Project Manager for the funded project.

The Choctaw Nation Office of Environmental Sustainability was awarded the Administration for Native Americans Social and Economic Development Strategies (SEDS) grant, 90NA8219-03-00, for the timeframe of 09/30/2012-09/29/2015 for the funded amount of \$452,527. This project allows for a recycling center which will serve as a hub for all mobile rollaway receptacles located in the area and be able to compact materials. All expected outputs and outcomes have been successfully completed within the allocated timeframe to date. Reporting history includes timely and adequate quarter and annual financial and progress reporting as required in the Assistance Agreement. Tracy Horst, the Office of Environmental Sustainability Director for the Choctaw Nation of Oklahoma was the Project Manager for the funded project.

#### **H. Quality Assurance Project Plan (QAPP) Information**

The project will not involve the use of existing environmental data or the collection of new data. Therefore, a Quality Assurance Project Plan will not be required.